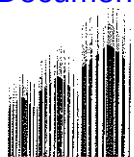


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DATE FILED: 10/26/2018

**Jeffrey C. Chancas**

**Partner**

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October 25, 2018

**Via ECF**

Honorable Gregory H. Woods  
United States District Judge  
United States District Court  
Southern District of New York  
United States Courthouse  
500 Pearl Street – Room 12C  
New York, New York 10007

**MEMORANDUM ENDORSED**

Re: Edwin Zayas v. 569 Hudson LLC and  
J.P.G. LLC  
United States District Court  
Southern District of New York  
Case No. 18-cv-07091 (GHW)(RWL)

Honorable Judge Woods:

This firm represents Defendant 569 Hudson LLC (“Hudson”) in the above-referenced matter. We respectfully request an extension of time for Hudson to answer, move or otherwise respond to the Complaint through and including November 21, 2018.

This is Hudson’s first request for an extension of time to answer.

This request for the extension of time for Hudson to answer the Complaint is being made to afford Hudson further time to investigate the allegations therein, to respond to the allegations, and to discuss settlement with Plaintiff’s counsel. This request does not interfere with any other scheduled dates, since the Initial Pretrial Conference is scheduled for November 28, 2018 at 4:30 p.m. This request is with the consent of Plaintiff’s counsel.

Although the case docket [ECF #10] says that the answer was due September 7, 2018, since the alleged service of process was made upon the New York State Secretary of State, Hudson’s principal advised me that Hudson never received the Summons and Complaint. In addition, Plaintiff did not file the Affidavit of Service until October 9, 2018, so until that date, the case docket never reflected that service of process had allegedly been effectuated and that the answer was due by September 7th.

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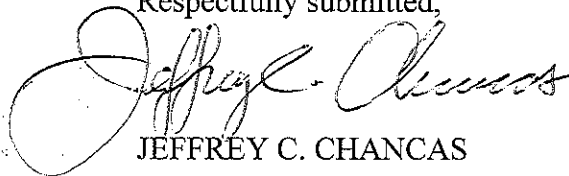
Honorable Gregory H. Woods  
United States District Judge  
October 25, 2018  
Page 2 of 2

In any event, there is no prejudice to Plaintiff from the requested extension of time and, as stated above, Plaintiff's counsel consents to the requested extension.

Wherefore, I respectfully request that the Court grant the extension of time for Hudson to file its answer to the Complaint until November 21, 2018.

Thank you.

Respectfully submitted,



JEFFREY C. CHANCAS

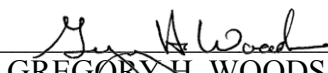
JCC:rg

Application granted. The deadline for Defendant 569 Hudson LLC to answer or otherwise respond to the complaint is extended to November 21, 2018.

Plaintiff is directed to serve a copy of this order on Defendant J.P.G. LLC and to retain proof of service.

SO ORDERED.

Dated: October 26, 2018  
New York, New York



GREGORY H. WOODS  
United States District Judge